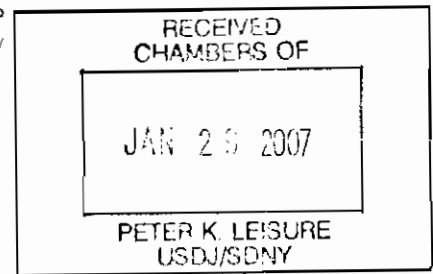


MEMO ENDORSED
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ROME LLP
COUNSELORS AT LAW

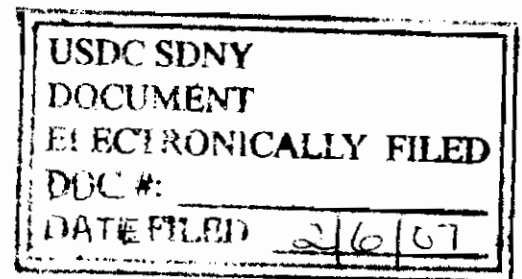


Phone: (212) 885-5149
Fax: (917) 332-3720
Email: JHarwood@BlankRome.com

January 26, 2007

BY HAND

Hon. Peter K. Leisure
United States District Judge
United States District Court
Southern District of New York
U.S. Courthouse
500 Pearl Street
New York, NY 10007



Re: CLIPPER SHIPPING LINES LTD. v.
GLOBAL TRANSPORTE OCEANICO S.A.
06 CV 15299 (PKL)

Dear Judge Leisure:

We are attorneys for defendant Global Transporte Oceanico S.A. ("Global") in respect of the captioned Rule B action. Plaintiff has successfully attached a certain sum of Defendant's assets.

We have served by fax and courier today and electronically filed today Defendants' Rule E expedited papers seeking countersecurity. As the Court is aware Admiralty Rule E(4)(F) permits a "prompt hearing" which Local Rule E.1 further suggests be "within three court days, unless otherwise ordered." We would be grateful therefore if the Court would advise of its availability for a hearing on the application under Rule E. The undersigned has depositions on Monday, Wednesday and Thursday but is otherwise available as the Court may direct this week.

We respectfully enclose courtesy copies of the following documents:

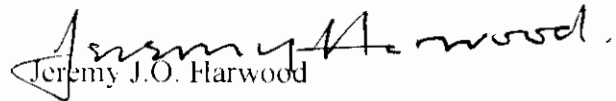
- (1) MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT GLOBAL TRANSPORTE OCEANICO S.A.'S COUNTERCLAIM FOR SECURITY FOR ITS ADMIRALTY COUNTERCLAIM UNDER RULE E(7) OF SUPPLEMENTAL RULES FOR ADMIRALTY OR MARITIME CLAIMS AND ASSET FORFEITURE CLAIMS OF THE FEDERAL RULES OF CIVIL PROCEDURE



Judge Peter K. Leisure
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Page 2

- (2) VERIFIED ANSWER AND COUNTERCLAIM UNDER ADMIRALTY
RULE E(7) OF SUPPLEMENTAL RULES FOR ADMIRALTY OR
MARITIME CLAIMS AND ASSET FORFEITURE CLAIMS OF THE
FEDERAL RULES OF CIVIL PROCEDURE
- (3) DECLARATION OF JEREMY J. O. HARWOOD
- (4) RULE 7.1 STATEMENT

Respectfully submitted,


Jeremy J.O. Harwood

JJH:rk
Attachments


cc: By Fax
Nancy R. Peterson, Esq.
Tisdale & Lennon LLC
Fax: 212-869-0067

Defendant's motion is for security on its counterclaim pursuant to Rule E(7) of the Supplemental Rules for Certain Admiralty and Maritime Claims ("Supp. Rules"), not for an order vacating an attachment pursuant to Rule E(4)(f) of the Supplemental Rules. Accordingly, no Rule E(4)(f) hearing is now scheduled. See Supp. Rule E(4)(f); Supp. Rule E Advisory Committee's Notes to 1985 Amendment. Opposition and reply papers, if any, are to be submitted as specified by Local Civil Rule 6.1(b).

SO ORDERED.

New York, New York

February 6, 2007



U.S.D.J.